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No. 20-cv-8067 (RA) (OTW)

- a. Depositions: Depositions shall be completed by November 29, 2021.
- b. Neither party may take more than 10 depositions. Absent an agreement between the parties or an order from the Court, non-party depositions shall follow initial party depositions.
- c. Initial Requests for Documents must be made by August 20, 2021.
- d. Responses to Requests for Documents must be made by **September 22, 2021**.

- e. Documents from third-parties (such as doctors) ~~will~~/will not (circle one) be required. If required, the following are the third-parties from whom Documents will be requested.
Plaintiff's medical providers.
- f. Subpoenas requesting Documents from third-parties must be served by **October 1, 2021**. Documents obtained from third-parties must be provided to all parties in this matter.
- g. There will/willnot(circle one) be expert testimony in this case. If expert testimony will be needed, please describe the topic on which the expert(s) is expected to testify:
Defendants do not believe that expert testimony is necessary in this matter. However, plaintiff believes that expert testimony from "mental health professionals" and certain DOC officials (i.e., the "warden or chief of the department") will be necessary.

4. Early Settlement or Resolution.

The parties have/~~havenot~~ (circle one) discussed the possibility of settlement. The parties request a settlement conference by no later than **October 28, 2021**. The following information is needed before settlement can be discussed:

Plaintiff would like to conduct a settlement conference "as soon as possible." Defendants believe that potential settlement cannot be meaningfully discussed until fact discovery is substantially completed (i.e., within 90 days).

5. Other Matters.

~~Plaintiff~~/Defendants (circle one) wish to discuss the following additional matters at the Initial Case Management Conference.

Plaintiff would like to discuss the preservation of video footage of the incident in this matter. Defendants note that, upon information and belief, video footage of the alleged use of force at issue in this matter has been preserved, and will be produced to plaintiff in due course.

Respectfully submitted this 29th day of July.

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